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11 *Attorneys for Defendant Elon Musk*

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14

15 VERNON UNSWORTH,  
16 Plaintiff,  
17 vs.  
18 ELON MUSK,  
19 Defendant.  
20

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DECLARATION OF ELON R. MUSK  
IN SUPPORT OF DEFENDANT'S  
MOTION FOR SUMMARY  
JUDGMENT, OR IN THE  
ALTERNATIVE PARTIAL  
SUMMARY JUDGMENT**

Complaint Filed: September 17, 2018  
Trial Date: December 2, 2019

Hearing Date: October 28, 2019  
Time: 1:30 p.m.  
Courtroom: 10A

1           **I, Elon R. Musk, declare as follows:**

2           1.       I am the defendant in this action. I am the founder and CEO of Tesla,  
3 Inc., a publicly traded company, founder and CEO of Space Exploration  
4 Technologies Corp. (“SpaceX”), and founder of The Boring Company. I make this  
5 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I  
6 could and would testify competently thereto.

7           2.       I submit this declaration in support of my Motion for Summary  
8 Judgment, or in the Alternative, Partial Summary Judgment.

9                           **Request for Assistance in the Thai Cave Rescue**

10          3.       On or around June 23, 2018, twelve members of a Thai youth soccer  
11 team and their coach went missing in the Tham Luang Cave System in Thailand’s  
12 Chiang Rai province. Shortly after they went missing, the Thai government started  
13 a search and rescue mission to locate and retrieve the soccer team. I learned of and  
14 followed the efforts from press reports.

15          4.       On July 3, 2018, Twitter user @MabzMagz asked me to join the rescue  
16 efforts and tweeted at my account “if possible can you assist in anyway to get the 12  
17 Thailand boys and their coach out of the cave.” A true and correct copy of that  
18 tweet is attached hereto as **Exhibit A**.

19          5.       On July 4, 2018, I responded in a tweet, “I suspect that the Thai govt.  
20 has this under control, but I’m happy to help if there is a way to do so.” A true and  
21 correct copy of that tweet is attached hereto as **Exhibit B**.

22          6.       Over the next day, several of my employees reached out to members of  
23 the Thai government, the United States Embassy in Thailand, private companies in  
24 Thailand, and members of the rescue dive team to see if there was a way for us to  
25 assist.

26          7.       After getting confirmation that our assistance would be useful, my team  
27 and I then got to work.  
28

**Extensive Work to Develop Rescue Options**

8. I mobilized more than 50 of my top engineers, manufacturers, and logistical specialists at SpaceX, Tesla, and The Boring Company to help rescue the stranded soccer team. I also immediately dispatched engineers to the cave system to obtain technical information about the rescue efforts and to assist in formulating a plan.

9. Based on the information they obtained about the constantly changing conditions in the cave, my team and I worked on three rescue strategies: surveying the cave system to potentially drill to the trapped boys, providing back-up power sources and water pumps if the weather conditions worsened, and creating three different versions of a mini-submarine that could be used to ferry members of the soccer team through the flooded cave to safety.

10. I communicated extensively with Richard Stanton, the leader of the British dive team at the rescue site, regarding the technical needs and specifications of the mission in order to effectively design and engineer the mini-submarine. A true and correct copy of my email correspondence with Mr. Stanton is attached hereto as **Exhibit C**.

11. On July 8, 2018, I emailed Mr. Stanton and stated that if the mini-submarine “isn’t needed or won’t help, that would be great to know.” Mr. Stanton responded that “it is absolutely worth continuing with the development of the system in as timely a manner as feasible. If the ran holds out it may well be used.” *See Exhibit C.*

12. Later that day, Mr. Stanton emailed me that “[w]e’re worried about the smallest lad please keep working on the capsule details.” *See Exhibit C.*

13. Between Friday July 6 and Sunday July 8, I, along with a team of engineers from SpaceX worked on designing, manufacturing, and testing the mini-submarines. We worked 24-hours a day, and most team members did not leave the Space X facility other than to obtain parts or perform pool tests. Once we

1 completed the most promising versions of the mini-submarine, we flew them  
2 approximately 18 hours from Los Angeles to Chiang Rai, Thailand.

3 14. Ultimately, the Thai Navy and dive team were able to rescue the soccer  
4 team without use of the mini-submarine.

5 15. I donated the min-submarines and ten power cells to the Thai Navy for  
6 use in future rescue missions. My team trained members of the Thai Navy on how  
7 to operate the mini-submarines.

8 16. The Thai prime minister personally thanked me and my team for our  
9 assistance and efforts. A true and correct copy of a letter that I received from the  
10 Thai prime minister is attached hereto as **Exhibit D**.

11 17. On July 10, 2018, I read a BBC article quoting the former governor of  
12 Chiang Rai who claimed that the mini-submarine was “not practical with our  
13 mission” to rescue the soccer team.

14 18. The governor was incorrect. I responded to the article in a tweet that  
15 included excerpts of my communications with Mr. Stanton. A true and correct copy  
16 of the tweet is attached hereto as **Exhibit E**.

17 **Unsworth’s False and Derogatory Comments About Me**

18 19. On July 15, 2018, I saw a video of an interview that Vernon Unsworth  
19 gave to CNN International.

20 20. In the video, the reporter asked Mr. Unsworth what he thought of my  
21 idea to use a mini-submarine to help rescue the stranded soccer team. Mr. Unsworth  
22 responded that I “can stick his submarine where it hurts. It just had absolutely no  
23 chance of working. [I] had no conception of what the cave passage was like. The  
24 submarine, I believe, was about 5 foot 6 long, rigid, so it wouldn’t have gone round  
25 corners or round any obstacles. It wouldn’t have made the first fifty meters into the  
26 cave from the dive start point. Just a PR stunt.”

27 21. Mr. Unsworth also falsely stated that I was asked to leave the rescue  
28 site “very quickly.”

22. After watching the video, I googled Mr. Unsworth. I learned from my search that he was a British expatriate who lived in the Chiang Rai province of Thailand. I googled Chiang Rai and read an article stating that it was a well-known hot spot for child prostitution and sex trafficking.

**My July 15, 2018 Tweets**

23. On July 15, 2018, I posted three tweets responding to Mr. Unsworth's false claims and attack on the effort and character of my team and me. True and correct copies of the first three tweets that I posted in response to Mr. Unsworth's interview are attached hereto as **Exhibits F-H**.

24. In the first tweet, I wrote "Never saw this British expat guy who lives in Thailand (sus) at any point when we were in the caves. Only people in sight were the Thai navy/army guys, who were great. Thai navy seals escorted us in – total opposite of wanting us to leave." *See* Exhibit F.

25. By referring to Mr. Unsworth as "sus," I did not intend to convey any facts. I was simply expressing my opinion that Mr. Unsworth seemed suspicious and that he appeared to be a weird guy.

26. In my second tweet, I wrote "Water level was actually very low & still (not flowing) – you could literally have swum to Cave 5 with no gear, which is obv how the kids got in. If not true, then I challenge this dude to show final rescue video. Huge credit to pump & generator team. Unsung heroes here." *See* Exhibit G.

27. In my third tweet, I wrote "You know what, don't bother showing the video. We will make one of the mini-sub/pod going all the way to Cave 5 no problem. Sorry pedo guy, you really did ask for it." *See* Exhibit H.

28. By referring to Mr. Unsworth as "pedo guy," I did not intend to convey any facts or imply that Mr. Unsworth had engaged in acts of pedophilia. "Pedo guy" was a common insult used in South Africa when I was growing up. It is synonymous with "creepy old man" and is used to insult a person's appearance and demeanor, not accuse a person of acts of pedophilia.

4           30. Finally, in response to a tweet referencing the insults I directed to Mr.  
5 Unsworth, I sent a fourth tweet on July 15, 2018 that stated, “bet ya a signed dollar  
6 its true.” A true and correct copy of that tweet is attached hereto as **Exhibit I**.

## My Apology to Unsworth

## The Investigation of Unsworth

20           34. Mr. Birchall orally provided me with periodic updates regarding the  
21 investigation.

35. Shortly after we retained Mr. Howard, Mr. Birchall provided me with disturbing information that the investigator uncovered. For instance, before August 28, 2018, Mr. Birchall informed me that the investigator reported that Mr. Unsworth met and began a relationship with his alleged Thai wife when she around twelve years old. Additionally, Mr. Birchall told me that Mr. Howard reported that Mr. Unsworth associated with Europeans who engage in improper sexual conduct in Thailand and had been traveling to Thailand since the 1980's.

1           36. In addition, in August 2018, Mr. Birchall told me that the investigator  
2 learned that Mr. Unsworth frequented Pattaya Beach which is well known for  
3 prostitution and sex tourism, and that Mr. Unsworth was unpopular at the rescue site  
4 because other rescue workers thought that he was “creepy.”

5           37. The last statement was consistent with a report I received from one of  
6 my employees who was present at the rescue that the dive team did not want Mr.  
7 Unsworth at the rescue site.

8           38. On August 28, 2018, in response to a tweet from TechCrunch reporter  
9 Drew Olanoff that my “dedication to facts and truth would have been wonderful if  
10 applied to that time when you called someone a pedo,” I tweeted “You don’t think  
11 it’s strange he hasn’t sued me? He was offered free legal services.” A true and  
12 correct copy of the twitter exchange is attached hereto as **Exhibit K**.

13           39. At the time I posted that tweet, I had already learned through Mr.  
14 Birchall about the investigator’s troubling initial reports about Mr. Unsworth.

15                           **My “Off The Record” Emails to BuzzFeed**

16           40. On August 29, 2018, Ryan Mac, a reporter for BuzzFeed News, sent  
17 me an email requesting a comment on a story that he was writing regarding a  
18 demand letter that Mr. Unsworth’s attorney purportedly sent me. I responded to Mr.  
19 Mac’s email that morning. A true and correct copy of my email exchange with Mr.  
20 Mac is attached hereto as **Exhibit L**.

21           41. On the evening of August 30, 2018, after I learned from Mr. Birchall of  
22 the investigator’s latest reports concerning Mr. Unsworth, Mr. Mac sent a follow-up  
23 email. *See* Exhibit L.

24           42. I replied with two emails to Mr. Mac that evening.

25           43. I wrote “Off the record” at the top of my first email to Mr. Mac. *See*  
26 Ex. L. By writing “off the record,” I explicitly instructed Mr. Mac not to publish the  
27 contents of my email. I certainly did not authorize Mr. Mac or BuzzFeed to publish  
28



1 the contents of the email nor did I intend or expect that they would, especially  
2 without first independently verifying and confirming its information.

3 44. I wrote that Mr. Mac should “stop defending child rapists.” *See Exhibit*  
4 L. My description of Mr. Unsworth as a child rapist was based on Mr. Birchall’s  
5 summary of the investigator’s report that Mr. Unsworth began his relationship with  
6 his wife when she was twelve years old.

7 45. I wrote that Mr. Unsworth had been “traveling to or living in Thailand  
8 for 30 to 40 years, mostly Pattaya Beach, until moving to Chiang Rai for a child  
9 bride that was about 12 years old at the time.” *See Exhibit L*. This statement was  
10 based on Mr. Birchall’s summary of the investigator’s findings.

11 46. I also wrote that “there’s only one reason people go to Pattaya Beach.  
12 It isn’t where you go for caves, but it is where you’d go for something else.” *See*  
13 *Exhibit L*. This statement was based on Mr. Birchall’s summary of the  
14 investigator’s findings.

15 47. I wrote that “Chiang Rai is renowned for child sex-trafficking.” *See*  
16 *Exhibit L*. This statement was supported by and consistent with a Google search  
17 that I provided in the email.

18 48. I also wrote that “most of the actual dive team refused to hang out with  
19 [Mr. Unsworth].” *See Exhibit L*. This statement was based on Mr. Birchall’s  
20 summary of the investigator’s findings and the report of one of my employees that  
21 the dive team did not want Mr. Unsworth at the site.

22 49. At the time I sent the first email to Mr. Mac, I did not know or believe  
23 that any statements in the email were false. Nor did I entertain any serious doubts as  
24 to their truth.

25 50. I wrote “on background” at the top of my second August 30, 2018  
26 email to Mr. Mac. By writing “on background,” I explicitly instructed Mr. Mac not  
27 to publish the contents of my email. I did not authorize Mr. Mac or BuzzFeed to  
28 publish the contents of the email nor did I intend or expect that they would,



1 especially without first independently verifying and confirming its information. A  
2 true and correct copy of my second August 30, 2018 email to Mr. Mac is attached  
3 hereto as **Exhibit M**.

4 51. In my second email, I wrote that I “[n]ever saw Mr. Unsworth at any  
5 point. Was told he was banned from the site.” *See* Exhibit M. My statement that I  
6 never saw Mr. Unsworth was true and based on my own observations at the cave  
7 rescue site. My statement that I “was told he was banned from the site” was based  
8 on the report of one of my employees that the dive team did not want Mr. Unsworth  
9 at the site.

10 52. At the time I sent the second August 30, 2018 email to Mr. Mac, I did  
11 not know or believe that any statements in the email were false. Nor did I entertain  
12 any serious doubts as to their truth.

13 53. I provided BuzzFeed and Mr. Mac with summaries of the information  
14 about Mr. Unsworth that I learned through Mr. Birchall and the investigator so that  
15 BuzzFeed could conduct its own investigation into Mr. Unsworth and corroborate  
16 the information.

17 54. On September 4, 2018, Mr. Mac replied to my August 30, 2018 emails.  
18 Among other things, he wrote that he “didn’t agree for the conversation to be off the  
19 record” and he “tried to report out some of the accusations on [his] own but have not  
20 found anything to corroborate the claims.” *See* Exhibit L.

21 55. That same day, I responded in an email that “We haven’t had a  
22 conversation at all. I sent you an off the record email, which very clearly and  
23 unambiguously said, ‘off the record.’ If you want to publish off the record  
24 comments and destroy your journalistic credibility, that’s up to you. As for  
25 answering more questions, I would be happy to do so, but not with someone who  
26 just told me that they will not honor accepted rules of journalism.”

27 56. I was extremely surprised by Mr. Mac’s suggestion that he would not  
28 treat the August 30, 2018 emails as off-the-record. Throughout my career, I have


1 had numerous off-the-record interactions with reporters. In those interactions,  
2 reporters treated information as off-the-record and did not publish it whenever I  
3 identified it as such, regardless of whether or not we reached an explicit agreement  
4 before I shared the information. Thus, I understood that by designating my emails  
5 to Mr. Mac as off-the-record and on background their contents would not be shared.

6 57. Mr. Mac's suggestion and ultimate decision to not treat the emails as  
7 off-the-record because he did not agree to do so before they were sent is not  
8 consistent with my prior off-the-record interactions with reporters.

9  
10 [Signature follows on next page]  
11  
12  
13  
14  
15  
16  
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27  
28

1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct and that this document was executed  
3 in Los Angeles, California.

4  
5 DATED: September 15, 2019

6  
7  
8 By   
9 \_\_\_\_\_  
10 Elon R. Musk  
11  
12  
13  
14  
15  
16  
17  
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21  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT A

**From:** [Elon Musk](#)  
**To:** [Steve Davis](#)  
**Subject:** Is there anything we could do short notice?  
**Date:** Wednesday, July 04, 2018 8:34:12 AM

---



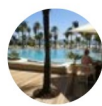
**MabzMagz (@MabzMagz)**

7/3/18, 9:57 PM

Hi sir, if possible can you assist in anyway to get the 12 Thailand boys and their coach out of the cave. [@elonmusk](#)

[Download](#) the Twitter app

# EXHIBIT B



**Mabz** @MabzMagz · 3 Jul 2018

Hi sir, if possible can you assist in anyway to get the 12 Thailand boys and their coach out of the cave. @elonmusk

117 1.4K 6.3K



**Elon Musk** ✓ @elonmusk

Follow

Replying to @MabzMagz

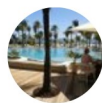
I suspect that the Thai govt has this under control, but I'm happy to help if there is a way to do so

7:02 AM - 4 Jul 2018

2,914 Retweets 20,362 Likes



555 2.9K 20K



**Mabz** @MabzMagz · 4 Jul 2018

Replying to @elonmusk

Thank you @elonmusk. That is really all I ask. that you follow the updates on the situation and perhaps you may come up with something. Some of us can only pray, but you can do more. We know you are not Ironman (...right?). Cheers

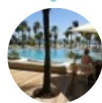
18 423 2.5K



**Elon Musk** ✓ @elonmusk · 4 Jul 2018

Boring Co has advanced ground penetrating radar & is pretty good at digging holes. Don't know if pump rate is limited by electric power or pumps are too smal. If so, could dropship fully charged Powerpacks and pumps.

177 1.4K 6.8K



**Mabz** @MabzMagz · 5 Jul 2018

I woke up to this sad news today. Our condolences to Saman's family who is a true hero in my books. I know that the Thailand authorities are doing everything in their power to save the boys and coach.

**BBC Breaking News** ✓ @BBCBreaking



# EXHIBIT C

**From:** [Elon Musk](#)  
**To:** [Thailand](#)  
**Subject:** Fwd: This is Elon Musk  
**Date:** Sunday, July 08, 2018 10:45:30 AM

---

Begin forwarded message:

**From:** Richard Stanton <[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
**Date:** July 8, 2018 at 10:13:12 AM PDT  
**To:** Elon Musk [REDACTED]  
**Subject:** Re: This is Elon Musk

We're worried about the smallest lad please keep working on the capsule details

Sent from my iPhone

On 8 Jul 2018, at 08:48, Elon Musk [REDACTED] wrote:

Sounds good, will continue.

Parts are being assembled and will undergo testing in water in a few hours. Will send pics and video. However, don't want to put it on a plane if you think there are important changes needed. Operating principle is same as spacecraft design — no loss of life even with two failures.

On Jul 7, 2018, at 6:30 PM, Richard Stanton <[resurgence42@gmail.com](mailto:resurgence42@gmail.com)> wrote:

It is absolutely worth continuing with the development of this system in as timely a manner as feasible.

If the rain holds out it may well be used.

Sent from my iPhone

On 8 Jul 2018, at 08:20, Elon Musk [REDACTED] wrote:

Understandable.

Right now, I have one the world's best engineering teams who normally design spaceships and spacesuits working on this thing 24 hours a day. We are trying to get it right in a very short period of time.

If it isn't needed or won't help, that would be great to know. Otherwise, it would be very helpful to have as much design direction as possible.

On Jul 7, 2018, at 6:07 PM, Richard Stanton <[resurgence42@gmail.com](mailto:resurgence42@gmail.com)> wrote:

Apologies, as the tone of that didn't come across well. We are all still very much on board with the concept of a tube for safe evacuation.

Though there does need to be a much more thorough investigation of all the matters mentioned in my previous mail.

I'm not going to be available for the rest of the day

Sent from my iPhone

On 8 Jul 2018, at 07:53, Elon Musk [REDACTED] wrote:

With respect, I am trying to be helpful. Please do not be rude.

On Jul 7, 2018, at 5:51 PM, Richard Stanton <[resurgence42@gmail.com](mailto:resurgence42@gmail.com)> wrote:

With respect all I see is a tube, albeit made of fancy materials. We're ferrying in food in such a thing. The devil is in the detail. Breathing systems, off board gas venting systems, ballast trimming arrangements etc adding additional gas via Quick Release SCUBA compatible fittings. Why not have a long high pressure cylinder between the legs? Or a stepped tube with wider body and thinner leg section.

Sent from my iPhone

On 8 Jul 2018, at 02:13, Elon Musk [REDACTED] wrote:

Will have more info for you soon. It is 35 cm in diameter and 160cm long. We can make more that are longer or shorter.

Dual air ports on front and rear (so possible to attach up to four tanks at once). Front ports are recessed into metal, so not subject to front damage. All ports have secondary caps in case a leak develops.

With the front caps on, this is strong enough to be used as a battering ram if need be. Nose is 2.5cm thick solid, high toughness 2219 alloy aluminium.

It is made from very high strength rocket-grade aluminium.

Cylinder section is  
what the Falcon  
rocket uses high  
pressure liquid  
oxygen transfer.

Weighs 35kg.

Will send pics in a  
few hours. Anything  
else that could be  
helpful? I am talking  
to the Prime Minister  
later today. Is there  
anything you would  
like me to convey?

<image1.jpeg>

On Jul 7, 2018, at  
6:58 AM, Richard  
Stanton  
<[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
wrote:

It only  
needs to  
go to a  
water  
depth of  
5m, plus  
some  
safety  
margin.

Sent  
from my  
iPhone

On  
7  
Jul  
2018,  
at  
18:00,  
Elon  
Musk

[REDACTED]  
wrote:

Ok

On  
Jul  
7,  
2018,  
at  
3:54  
AM,

Richard  
Stanton  
<[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
wrote:

I'm  
not  
sure  
about  
the  
rubber  
cocoon  
at  
it  
would  
transmit  
pressure  
onto  
the  
child.

Rigid  
is  
better,  
plus  
O2  
as  
a  
breathing  
gas  
rather  
than  
air.

Sent  
from  
my  
iPhone

On  
7  
Jul  
2018,  
at  
17:46,  
Elon  
Musk

  
wrote:

Ok

Building  
both

a  
pressure  
resistant  
aluminium  
tube  
and  
a  
dry  
rubber  
cocoon.

Baseline  
requirement  
is  
that  
whether  
the  
person  
is  
passed  
out  
or  
having  
a  
panic  
attack,  
they  
will  
still  
be  
fine.  
Also,  
no  
stray  
hoses  
that  
can  
get  
caught  
on  
anything  
or  
pulled  
out.

Basically  
a  
straightjacket  
with  
an  
air  
feed.

Is  
this  
roughly  
the  
right  
direction?

On  
Jul  
7,  
2018,  
at  
2:56  
AM,  
Richard  
Stanton  
<[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
wrote:

We  
don't  
have  
this,  
it  
won't  
mean  
anything  
without  
scale.

If  
you  
make  
a  
capsule  
which  
tightly  
encloses  
a  
15  
year  
old  
boy,  
and  
no  
bigger.  
It  
will  
fit  
through.

Sent  
from  
my  
iPhone

On  
7  
Jul  
2018,  
at  
16:13,  
Elon



Musk

wrote:

Would  
it  
be  
possible  
to  
send  
me  
a  
video  
segments  
or  
several  
pictures  
of  
the  
most  
difficult  
sections?  
This  
would  
be  
extremely  
helpful.

On  
Jul  
6,  
2018,  
at  
10:29  
PM,  
Richard  
Stanton  
<[resurgence42@gmail.com](mailto:resurgence42@gmail.com)>  
wrote:

Thanks  
for  
the  
chat  
just  
now,  
we're  
not  
going  
to  
be  
available  
for  
any  
communication  
for  
a  
short  
while.

Will  
review  
any  
ideas  
or  
concepts  
you  
come  
up  
with  
and  
get  
back  
to  
you  
later.

Sent  
from  
my  
iPhone

On  
7  
Jul  
2018,  
at  
02:54,  
Elon  
Musk

  
wrote:

Are  
you  
one  
of  
the  
divers  
who  
understands  
the  
cave  
geometry?  
Trying  
to  
help  
out,  
but  
need  
to  
know  
the  
details  
of  
the

most  
problematic  
areas.

# EXHIBIT D



Office of the Prime Minister,  
Government House,  
**BANGKOK.**

26 July B.E. 2561 (2018)

Dear Mr. Musk,

I wish to convey my deep appreciation to you and your engineering team for your expeditious and extraordinary efforts in constructing the Space-X mini-submarine “Wild Boar” to assist the rescue operation of the Moo Pa Academy Football team trapped in Tham Luang Cave, Chiang Rai Province.

I am particularly touched that you personally travelled to Thailand to deliver the “Wild Boar” Space-X mini-sub, which was made possible through your expertise and the cooperation with various experts involved with this highly complicated and urgent rescue operation. Your initiative and involvement indeed exemplifies the significance of compassion and ingenuity in responding to extremely complex and life-threatening situations. Furthermore, the endeavour of courage and determination by all who took part in this perilous operation, both Thai and foreign, is testament to what can be achieved in the face of seemingly unsurmountable odds. The rescue has inspired people around the world and reaffirmed our faith in the power of solidarity and cooperation in times of crises. Indeed, this historic episode of immediate assistance and resolve demonstrates humanity at its best.

Looking ahead, I hope that you will have a chance to visit Thailand again soon. I believe that there are many opportunities for us to cooperate on, especially on how to harness technology and innovation for the benefit of sustainable development and towards enhancing the well-being of all global citizens.

I would like to extend to you my best wishes for your good health and success.

Yours sincerely,

General  (Ret.)  
(Prayut Chan-o-cha)

Prime Minister of the Kingdom of Thailand

Mr. Elon Musk,  
Chief Executive Officer,  
Space Exploration Technologies Corporation,  
**CALIFORNIA.**

# EXHIBIT E

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## Didi

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## #SpiritMusicVideo

Beyoncé drops the SPIRIT music video

## John Paul Stevens

Former US Supreme Court Justice John Paul Stevens has died

## Justice Stevens

Former US Supreme Court Justice John Paul Stevens has died

## #RHOBHReunion

3,710 Tweets

## #The100

18.4K Tweets

## Neris

1,210 Tweets

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Elon Musk · @elonmusk · 10 Jul 2018

Replying to @BBCWorld

The former **Thai** provincial governor (described inaccurately as "rescue chief") is not the subject matter expert. That would be Dick Stanton, who co-led the dive rescue team. This is our direct correspondence:

From: Richard Stanton  
 Date: July 8, 2018 at 10:13:12 AM PDT  
 To: Elon Musk  
 Subject: Re: [REDACTED]

We're worried about the smallest lad please keep working on the capsule details

Sent from my iPhone

On 8 Jul 2018, at 08:48, Elon Musk <[REDACTED]> wrote:

Sounds good, will continue.

Parts are being assembled and will undergo testing in water in a few hours. Will send pics and video. However, don't want to put it on a plane if you think there are important changes needed. Operating principle is same as spacecraft design — no loss of life even with two failures.

On Jul 7, 2018, at 6:30 PM, Richard Stanton <[REDACTED]> wrote:

It is absolutely worth continuing with the development of this system in as timely a manner as feasible. If the rain holds out it may well be used.

Sent from my iPhone

On 8 Jul 2018, at 08:20, Elon Musk <[REDACTED]> wrote:

Understandable.

Right now, I have one of the world's best engineering teams who normally design spaceships and spacecrafts working on this thing 24 hours a day. We are trying to get it right in a very short period of time.

If it isn't needed or won't help, that would be great to know. Otherwise, it would be very helpful to have as much design direction as possible.



1.0K



4.4K

32K



Elon Musk · @elonmusk · 4 Jul 2018

Replying to @MabzMagz

I suspect that the **Thai** govt has this under control, but I'm happy to help if there is a way to do so



563



2.9K

21K



Elon Musk · @elonmusk · 18 Feb 2017

Replying to @Xuan\_Thai

System was green for launch. I called it off.



69



170

1.1K


[Back to top](#)



# EXHIBIT F



**Elon Musk**

@elonmusk

Follow



Replying to @zeynep

Never saw this British expat guy who lives in Thailand (sus) at any point when we were in the caves. Only people in sight were the Thai navy/army guys, who were great. Thai navy seals escorted us in — total opposite of wanting us to leave.

6:56 AM - 15 Jul 2018

344 Retweets 4,552 Likes



236



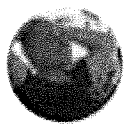
344



4.6K

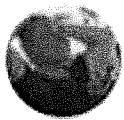


# EXHIBIT G



**Elon Musk** ● @elonmusk · 24m

Never saw this British expat guy who lives in Thailand (sus) at any point when we were in the caves. Only people in sight were the Thai navy/army guys, who were great. Thai navy seals escorted us in — total opposite of wanting us to leave.



**Elon Musk** ● @elonmusk

Follow

Replying to @elonmusk @zeynep

Water level was actually very low & still (not flowing) — you could literally have swum to Cave 5 with no gear, which is obv how the kids got in. If not true, then I challenge this dude to show final rescue video. Huge credit to pump & generator team. Unsung heroes here.

7:04 AM · 15 Jul 2018

10 Retweets 134 Likes

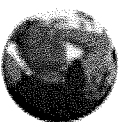


20

10

134

20



**Elon Musk** ● @elonmusk · 10m

Replying to @elonmusk @zeynep

You know what, don't bother showing the video. We will make one of the mini-sub/pod going all the way to Cave 5 no problemo. Sorry pedo guy, you really did ask for it.

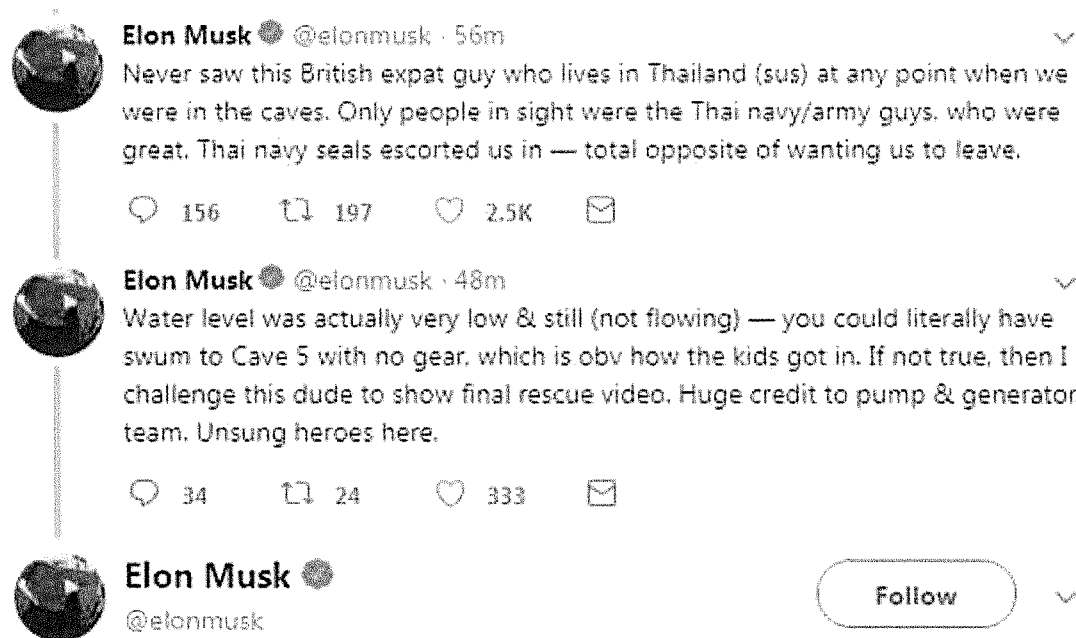
34

10

83

34

# EXHIBIT H



Replying to @elonmusk @zeynep

You know what, don't bother showing the video. We will make one of the mini-sub/pod going all the way to Cave 5 no problemo. Sorry pedo guy, you really did ask for it.

4:10 AM - 15 Jul 2018

# EXHIBIT I





**Elon Musk**   
@elonmusk

Following



Replying to @GossiTheDog

Bet ya a signed dollar it's true

11:11 AM - 15 Jul 2018

44 Retweets 255 Likes



# EXHIBIT J

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(unsworth) (from:elonmusk)



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#### #SDLive

55.3K Tweets

#### Jansen

4,037 Tweets

#### Damon

11.8K Tweets

#### #SpiritMusicVideo

Beyoncé drops the SPIRIT music video

#### John Paul Stevens

Former US Supreme Court Justice John Paul Stevens has died

#### Kenley

1,682 Tweets

#### Didi

Sir Didi and Aaron Judge have the last laugh as the Yankees beat the Rays

#### Justice Stevens

Former US Supreme Court Justice John Paul Stevens has died



**Elon Musk** @elonmusk · 17 Jul 2018

Replying to @elonmusk @adamchavez

Nonetheless, his actions against me do not justify my actions against him, and for that I apologize to Mr. **Unsworth** and to the companies I represent as leader. The fault is mine and mine alone.



1.0K



983

8.5K



**Elon Musk** @elonmusk · 17 Jul 2018

Replying to @adamchavez

As this well-written article suggests, my words were spoken in anger after Mr. **Unsworth** said several untruths & suggested I engage in a sexual act with the mini-sub, which had been built as an act of kindness & according to specifications from the dive team leader.



1.4K



1.8K

21K



# EXHIBIT K



**drew olanoff**  @yoda · Aug 29, 2018



Replying to @yoda and 3 others

one other thing, elon. your dedication to facts and truth would have been wonderful if applied to that time when you called someone a pedo.



**Elon Musk** 

@elonmusk

You don't think it's strange he hasn't sued me? He was offered free legal services. And you call yourself @yoda ...

2:41 AM - Aug 29, 2018

♡ 1,551 💬 869 people are talking about this



# EXHIBIT L

**From:** [REDACTED]  
**To:** [Ryan Mac](#)  
**Subject:** Re: BuzzFeed News: Unsworth legal letter  
**Date:** Tuesday, September 04, 2018 5:31:45 PM

---

Get lost, you creep

On Sep 4, 2018, at 5:30 PM, Ryan Mac <[ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)> wrote:

Hey Elon,

I'm sure you've seen the story at this point. Still happy to talk with you on whatever terms you want as long as we set them beforehand. Let me know if you want to do a phone call.

Best,  
R

On Tue, Sep 4, 2018 at 1:18 PM, Elon Musk [REDACTED] wrote:  
Off the record

I suggest you ask Unsworth to describe his whole ~30 year history of visiting Thailand. What was he doing in Pattaya Beach for the better part of a decade when there are no caves of note in the area?

On Sep 4, 2018, at 12:22 PM, Ryan Mac <[ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)> wrote:

Hi Elon,

While I'd rather chat on the record, I'm happy to go off record with you moving forward so you can answer specific questions regarding the allegations you've made.

Thanks,  
Ryan

On Tue, Sep 4, 2018 at 10:53 AM, Elon Musk [REDACTED] wrote:

Off the record

We haven't had a conversation at all. I sent you an off the record email, which very clearly and unambiguously said "off the

record". If you want to publish off the record comments and destroy your journalistic credibility, that's up to you.

As for answering more questions, I would be happy to do so, but not with someone who just told me that they will not honor accepted rules of journalism.

On Sep 4, 2018, at 8:49 AM, Ryan Mac  
<[ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)> wrote:

Hi Elon,

I didn't agree for the conversation to be off the record, but appreciate the response. To follow up, I've tried to report out some of these accusations on my own but have not found anything to corroborate the claims. Are you able to share anything that you've found about Vernon Unsworth? Do you have any evidence or documentation showing he took a 12-year-old child bride, that he is a child rapist, or that he was kicked off the rescue site, as you stated in your other email? Also are you able to share your correspondence with Rick Stanton showing your discussion of the submarine specs?

With regards to your statement about the legal threat not coming up until you raised the issue on Twitter, the legal letter was dated on Aug. 6 and sent to your Los Angeles home and to one of your SpaceX emails. Did you not see the letter prior to your tweets?

Thank you,  
Ryan

On Thu, Aug 30, 2018 at 6:43 PM, Elon Musk  
[REDACTED] wrote:

Off the record

I suggest that you call people you know in Thailand, find out what's actually going on and stop defending child rapists, you fucking asshole. He's an old, single white guy from England who's been traveling to or living in Thailand for 30 to 40 years, mostly Pattaya Beach, until moving to Chiang Rai for a child bride who was about 12 years old at the time. There's only one reason people go to Pattaya Beach. It isn't where you'd go



for caves, but it is where you'd go for something else. Chiang Rai is renowned for child sex-trafficking.

He may claim to know how to cave dive, but he wasn't on the cave dive rescue team and most of the actual dive team refused to hang out with him. I wonder why ...

<https://www.google.com/search?q=chiang+rai+child+trafficking&ie=UTF-8&oe=UTF-8&hl=en-us&client=safari>

As for this alleged threat of a lawsuit, which magically appeared when I raised the issue (nothing was sent or raised beforehand), I fucking hope he sues me.

On Aug 30, 2018, at 6:07 PM, Ryan Mac  
<[ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)> wrote:

Hey Elon, just wanted to make sure I did my due diligence to research basic facts and follow up here.

Thanks,



**Ryan Mac** | **BuzzFeed News** | Senior  
Technology Reporter Cell: (949) 315-9364  
| Office: (415) 477-1620 |  
[@rmac18](mailto:@rmac18) | [121 2nd Street, 3rd Floor.](#)  
[San Francisco, CA 94105](#) |  
<https://www.buzzfeed.com/ryanmac>

On Wed, Aug 29, 2018 at 9:06 AM,  
Ryan Mac

<[ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)> wrote:

Hey Elon, thanks for getting back. Actually he prefers to be called a "spelunker" and we've confirmed that he actually does do cave diving. But do you have any comment on the letter your received?



**Ryan Mac** | **BuzzFeed News** | Senior  
Technology Reporter Cell: (949) 315-  
9364 | Office: (415) 477-1620 |  
[@rmac18](#) | [121 2nd Street, 3rd Floor,  
San Francisco, CA 94105](#) |  
<https://www.buzzfeed.com/ryanmac>

On Wed, Aug 29, 2018 at 8:38 AM,  
Elon Musk [REDACTED]  
wrote:

Have you actually done any  
research at all? For example, you  
incorrectly state that he is a diver,  
which shows that you know  
essentially nothing and have not  
even bothered to research basic  
facts.

On Aug 29, 2018, at 7:40 AM,  
Ryan Mac  
<[ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)>  
wrote:

Hi Elon,

Ryan from BuzzFeed  
News here. We're  
reporting a story out  
about you receiving a  
letter from a lawyer  
representing British  
diver Vernon  
Unsworth. The letter,  
dated August 6, was  
sent to your Los  
Angeles home and  
discusses potential  
legal proceedings  
against you for libel.

Given the Twitter  
conversation  
yesterday, I was  
hoping you could talk

about the letter and  
whether you had seen  
it yet. I'm happy to  
chat on the phone if  
you want to call me at  
[REDACTED]

Best,



**Ryan Mac** | **BuzzFeed**  
**News** | Senior

Technology Reporter

Cell: (949) 315-9364 |

Office: (415) 477-1620 |

[@rmac18](#) | [121 2nd](#)

[Street, 3rd Floor, San](#)  
[Francisco, CA 94105](#) |

[https://www.buzzfeed.com/ryanm](https://www.buzzfeed.com/ryanmac)  
[ac](#)

# EXHIBIT M

**From:** [Elon Musk](#)  
**To:** [ryan.mac@buzzfeed.com](mailto:ryan.mac@buzzfeed.com)  
**Subject:** Fwd: Letters  
**Date:** Thursday, August 30, 2018 7:16:04 PM  
**Attachments:** [Scannable Document on Aug 30, 2018 at 6\\_55\\_21 PM.pdf](#)  
[ATT00001.htm](#)

---

On background

Unsworth also said I was asked to leave by the Thai govt, which is utterly false. Thai Prime Minister thanked me personally per attached docs. I went all the way to area 3 with the Thai SEAL team, who were awesome. Never saw Unsworth at any point. Was told he was banned from the site.

It is also total bs that the mini-sub wouldn't fit through the caves. It was designed and built to specifications provided to me directly by Stanton and the actual dive team. The only reason it wasn't used was that they were able to drain almost all the water out of the caves, so the underwater portion was very short, and the monsoon arrived later than expected.

Those pumps were critical. Some of the Tesla team helped with electrical power, but major credit to whoever provided those pumps. They were amazing. I'm told they were from some company in India.

Begin forwarded message:

# EXHIBIT N

From: Sam Teller  
Sent: Mon 7/15/2019 8:09 PM (GMT-07:00)  
To: Jehn Balajadia  
Cc:  
Bcc:  
Subject: Fwd: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Begin forwarded message:

**From:** Reyna Ortiz <[reyna@spacex.com](mailto:reyna@spacex.com)>  
**Date:** July 17, 2018 at 8:00:56 PM EDT  
**To:** Sam Teller <[steller@spacex.com](mailto:steller@spacex.com)>  
**Subject:** Re: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Nope don't believe so. Not sure how he got my email – just seemed a little odd what he mentioned.

**From:** Sam Teller <[steller@spacex.com](mailto:steller@spacex.com)>  
**Date:** Tuesday, July 17, 2018 at 4:59 PM  
**To:** Reyna Ortiz <[reyna@spacex.com](mailto:reyna@spacex.com)>  
**Subject:** Re: From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Have we interacted with this person before?

On Jul 17, 2018, at 4:41 PM, Reyna Ortiz <[reyna@spacex.com](mailto:reyna@spacex.com)> wrote:

FYI – Fine to ignore?

**From:** Jupiter Private Office <[info@jupiter-private.com](mailto:info@jupiter-private.com)>  
**Date:** Tuesday, July 17, 2018 at 8:51 AM  
**To:** Reyna Ortiz <[reyna@spacex.com](mailto:reyna@spacex.com)>  
**Subject:** From James Howard - FAO Elon Musk - RE:Vernon Unsworth

Dear Reyna,

I am having difficulty contacting Elon. Could you pass on the email below. Like Elon I think that Mr. Unsworth has skeletons in his cupboard.

Kind regards,  
James Howard  
CEO  
Jupiter Military & Tactical Systems  
+44 (0) 7917 401601  
+44 (0) 7388 539104  
[info@jupiter-private.com](mailto:info@jupiter-private.com)



[www.jupiter-private.com](http://www.jupiter-private.com)

<image001.jpg>

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**From:** Jupiter Private Office [<mailto:info@jupiter-private.com>]

**Sent:** 17 July 2018 16:03

**To:** 'ElonMuskOffice@TeslaMotors.com'

**Subject:** From James Howard - Vernon Unsworth - Past & Present

Dear Elon,

You may wish to dig deep and look into Mr. Unsworth past to prepare for his defamation claim. No smoke without fire!

I can discreetly assist & have a team in Bangkok.

If you wish to engage please call me.

Rgds,

James Howard

CEO

Jupiter Military & Tactical Systems

+44 (0) 7917 401601

[info@jupiter-private.com](mailto:info@jupiter-private.com)

[www.jupiter-private.com](http://www.jupiter-private.com)

<image001.jpg>

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